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7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 JERIANNE R. VOORHEES,

Case No.: 2:20-cv-00916-JDP

10 Plaintiff,

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12 STIPULATION FOR FINAL EXTENSION
13 OF TIME FOR PLAINTIFF TO FILE
14 OPENING BRIEF

ANDREW M. SAUL,
Commissioner of Social Security,

ECF No. 17

Defendant.

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16 IT IS STIPULATED, by and between the parties, through their respective counsel of record,
17 that the time for Plaintiff to file her motion for summary judgment be extended for a final thirty (30)
18 day period, such that Plaintiff's motion, with the Court's approval, will be due to be filed by January
19 18, 2021. This is Plaintiff's second request for an extension of time. Plaintiff's counsel apologizes
20 for the delay but needs additional time to properly prepare Plaintiff's motion for summary judgment
21 because in the last 30 days Plaintiff's counsel has had multiple filing deadlines in other social
22 security matters pending in district court and an appearance before the Ninth Circuit; in the last 30
23 days Plaintiff's counsel has been responsible for handling or assisting with two mediations in
24 complicated state court litigation matters pending in Sonoma County and Santa Clara County; in
25 the last 30 days counsel was responsible for filing five separate motions to compel discovery in two
26 additional pending state court matters venued in Sacramento County and Santa Clara County; as
27 well as ongoing childcare responsibilities relating to counsel's young children not attending in-
28 person school currently. With the Court's approval, the parties further stipulate that all other dates

1 in the Court's Scheduling Order be extended accordingly.

2 Dated: December 17, 2020

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4 Respectfully submitted,

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8 /s/ Jared T. Walker
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10 Jared T. Walker,
11 Attorney for Plaintiff

12 SO STIPULATED:

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McGREGOR W. SCOTT
United States Attorney

Dated: December 17, 2020

By: /s/ *S. Wyeth McAdam
(*authorized by email on 12/17/2020)
S. Wyeth McAdam
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

The parties' stipulated second extension of time for plaintiff to file a motion for summary judgment is approved and so ordered.

IT IS SO ORDERED.

Dated: December 21, 2020

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE